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*Attorneys for Plaintiff Twitter, Inc.*

16 **UNITED STATES DISTRICT COURT**  
17 **NORTHERN DISTRICT OF CALIFORNIA**  
18 **OAKLAND DIVISION**

19 TWITTER, INC.,

20 Plaintiff,

21 v.

22 WILLIAM P. BARR, Acting Attorney General  
of the United States, *et al.*

23 Defendants.  
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Case No. 14-cv-4480-YGR

**JOINT STIPULATION FOR  
EXTENSION OF TIME TO FILE  
STIPULATION REGARDING FURTHER  
PROCEEDINGS FOLLOWING  
DEFENDANTS' ASSERTION OF STATE  
SECRETS**

Hon. Yvonne Gonzalez Rogers

Pursuant to Local Rules 6-1 and 6-2, Plaintiff Twitter, Inc. and Defendants William P. Barr, the United States Department of Justice, Christopher Wray, and the Federal Bureau of Investigation (collectively, “Defendants”), by and through their respective counsel of record, submit the following joint stipulation.

WHEREAS:

1. On February 14, 2019, the Court granted the parties’ prior joint stipulation and ordered (1) the Government, by March 15, 2019, to inform the Court and Twitter whether it intends to assert the state secrets privilege in this matter, and (2) the parties, by March 19, 2019, to submit “a proposed schedule for further proceedings based on the Government’s decision regarding an assertion of the state secrets privilege (including a proposed briefing schedule if the Government does decide to invoke the state secrets privilege).” Dkt. No. 272.

2. On or about March 15, 2019, Defendants filed a Request that the Court Discharge the Order to Show Cause and Deny Plaintiff’s Request for Access to the Classified Steinbach Declaration, or in the Alternative, a Motion to Dismiss in Light of the Attorney General’s Assertion of the State Secrets Privilege (the “State Secrets Motion”). *See* Dkt. No. 281 (Motion); *see also* Dkt. No. 282 (Notice of Lodging of Classified Declaration of Michael C. McGarrity).

3. On March 18 and 19, 2019, the parties met and conferred regarding further proceedings in this matter in light of Defendants’ State Secrets Motion.

4. In light of the numerous issues raised—both in the State Secrets Motion and in the course of the parties’ meet-and-confer—Twitter requires two additional days to consider how it would like to proceed.

5. Accordingly, the parties have jointly agreed to stipulate to a two-day extension of time to file their joint stipulation regarding further proceedings in light of the Government’s assertion of state secrets.

6. A proposed order on the parties’ joint stipulation is attached hereto.

1 Agreed to and submitted by:

2 Dated: March 19, 2019

MAYER BROWN LLP

3 /s/ Lee H. Rubin  
4 MAYER BROWN LLP  
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14 *ATTORNEYS FOR PLAINTIFF*  
15 *TWITTER, INC.*

16 Pursuant to General Order No. 45, I, Lee H. Rubin, attest that I obtained concurrence in  
17 the filing of this document from the following signatories.

18 Dated: March 19, 2019

19 JOSEPH H. HUNT  
20 Assistant Attorney General  
21 DAVID L. ANDERSON  
22 United States Attorney  
23 ANTHONY J. COPPOLINO  
24 Deputy Branch Director  
25 JULIA A. HEIMAN (Bar No. 241415)  
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19 /s/ Julia A. Heiman  
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Case No. 14-cv-4480-YGR

**[PROPOSED] ORDER GRANTING  
JOINT STIPULATION FOR  
EXTENSION OF TIME TO FILE  
STIPULATION REGARDING FURTHER  
PROCEEDINGS FOLLOWING  
DEFENDANTS' ASSERTION OF STATE  
SECRETS**

Hon. Yvonne Gonzalez Rogers

1 Pursuant to the stipulation of the parties, the Court hereby GRANTS the joint stipulation  
2 for an extension of time for the parties to submit a proposed schedule for further proceedings  
3 based on the Government's decision to assert the state secrets privilege. The Court hereby  
4 extends the deadline for the parties to file such joint stipulation to March 21, 2019.

5 IT IS SO ORDERED.

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7 Dated:

8 The Hon. Yvonne Gonzalez Rogers  
9 United States District Judge  
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